

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY

Joseph Baxter (OSB 215137)

Paul Southwick Law, LLC

8532 N. Ivanhoe St. #208

Portland, OR 97203

Email: paul@paulsouthwick.com

Email: joe@paulsouthwick.com

Phone: 503-806-9517

Timothy R. Volpert (OSB 814074)

Tim Volpert PC

2111 NE Hancock St. Ste. 2B

Portland, OR 97212

Email: tim@timvolpertlaw.com

Phone: 503-703-9054

Misha Isaak (OSB 086430)

Alletta S. Brenner (OSB 142844)

Perkins Coie LLP

1120 N.W. Couch Street, Tenth Floor

Portland, Oregon 97209-4128

Email: ABrenner@perkinscoie.com

Email: misaak@perkinscoie.com

Phone: 503-727-2000

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al.,

Plaintiffs,

v.

DEPARTMENT OF EDUCATION; and Catherine
LHAMON, in her official capacity as Assistant Secretary for
the Office of Civil Rights, U.S. Department of Education,

Defendants,

COUNCIL FOR CHRISTIAN COLLEGES &
UNIVERSITIES, WESTERN BAPTIST COLLEGE
d/b/a CORBAN UNIVERSITY, WILLIAM JESSUP
UNIVERSITY AND PHOENIX SEMINARY,

Intervenor-Defendants.

Case No. 6:21-cv-00474-AA

**DECLARATION OF
CAMERON MARTINEZ
ISO SUPPLEMENTAL
BRIEF OF NEWLY
DISCOVERED FACTS**

I, Cameron Martinez, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this

declaration and would testify truthfully to them if called upon to do so.

2. It was very empowering and validating to have the Department of Education's Office of Civil Rights (OCR) open an investigation into my Title IX complaint. It finally felt like someone was seeing me and taking my allegations seriously.
3. But this was a false hope. To have my complaint denied entirely, compounds and reinforces the pain inflicted by my university, is discriminatory, and is retraumatizing to me.
4. To see the Office of Civil Rights, part of the executive arm of the U.S. Government, validating this discrimination, interpreting a law to exclude me from legal protections, allowing me to be targeted and discriminated against because of my sexual orientation and gender identity, and adding pressure for me to be silent instead of speaking out against LGBTQ+ discrimination, is dehumanizing, and is systemically oppressive.
5. OCR's dismissal of my complaint makes me feel less equal than students at other institutions and less equal than cisgender, heterosexual students at my institution.
6. The false hope and dismissal from OCR feel like the government is punishing me because of where I went to college and because of my sexual orientation and gender identity.
7. It is incredibly dehumanizing and painful to be excluded from civil rights protections because of my sexual orientation and gender identity.
8. I shouldn't have had to consider my sexual orientation and gender identity as a factor in considering where I went to get an education, nor should that have limited the number of available schools I qualified to attend.
9. Providing federal taxpayer funds to these institutions, taxes that I bear the burden of, and then barring me from equal participation in the resulting funded educational programs, is

demeaning and is second-class citizenship. It is the government's stamp of approval of an idea that I am somehow less than, or undeserving, because of a deeply important aspect of my being.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 7th day of November, 2022.

By: s/Cameron Martinez
Cameron Martinez
